

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

WIKIMEDIA FOUNDATION, *et al.*,

Plaintiffs,

v.

NATIONAL SECURITY AGENCY / CENTRAL
SECURITY SERVICE, *et al.*,

Defendants.

Hon. T. S. Ellis, III

Civil Action No.
15-cv-00662-TSE

PLAINTIFFS' MOTION TO AMEND THE COMPLAINT

Pursuant to Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiffs hereby move to amend the Complaint as a matter of course. Plaintiffs filed their Complaint on March 10, 2015 (ECF No. 1), and Defendants filed a motion to dismiss the action under Federal Rule of Civil Procedure 12(b)(1) on May 29, 2015 (ECF No. 66). A party may amend its pleading once as a matter of course 21 days after service of a responsive pleading or 21 days after service of a motion under Rule 12(b), whichever is earlier. *See* Fed. R. Civ. P. 15(a)(1)(B). Defendants have not yet served a responsive pleading in this action; therefore, the 21-day period provided in Rule 15(a)(1)(B) began on May 29 when Defendants filed their motion to dismiss. Accordingly, this filing is timely.

Plaintiffs sought Defendants' consent to this motion, and Defendants have acknowledged that Plaintiffs may amend the Complaint as a matter of course on or before June 19, 2015.

Dated: June 19, 2015

Respectfully submitted,

/s/ Patrick Toomey

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*(signed by Patrick Toomey with
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